

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

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In re:	:	X
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THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,	:	PROMESA
	:	Title III
as representative of	:	Case No. 17-BK-3283 (LTS)
THE COMMONWEALTH OF PUERTO RICO <i>et al.</i>	:	(Jointly Administered)
Debtors. <sup>1</sup>	:	
	:	
	X	

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**INFORMATIVE MOTION OF OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS REGARDING APRIL 28-29, 2021, OMNIBUS HEARING**

To the Honorable United States District Judge Laura Taylor Swain:

The Official Committee of Unsecured Creditors of all Title III Debtors (the “Committee”)<sup>2</sup> hereby submits this informative motion in response to the Court’s *Order Regarding Procedures for April 28-29, 2021, Omnibus Hearing* [Case No. 17-3283, Docket No. 16475] (the “Scheduling Order”) and respectfully states as follows:

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<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17-BK-3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

<sup>2</sup> The Committee is the official committee of unsecured creditors for all Title III Debtors, other than PBA and COFINA.

1. Luc A. Despins and Nicholas A. Bassett of Paul Hastings LLP will appear telephonically on behalf of the Committee at the Hearing (as defined in the Scheduling Order), and address, as necessary, the following matters:<sup>3</sup>

- (a) Status Report to be filed by the Oversight Board;
- (b) Status Report to be filed by AAFAF;
- (c) *Debtors' Joint Motion for an Order (I) Scheduling a Hearing to Consider the Adequacy of Information Contained in the Disclosure Statement, (II) Establishing the Deadline for Filing Objections to the Disclosure Statement and Replies Thereto, (III) Approving Form of Notice Thereof, (IV) Establishing Document Depository Procedures in Connection Therewith, and (V) Granting Related Relief* [Case No. 17-3283; Docket No. 16332];
  - (i) *Limited Objection of Official Committee of Unsecured Creditors to Debtors' Joint Motion for Order (I) Scheduling a Hearing to Consider Adequacy of Information Contained in Disclosure Statement, (II) Establishing Deadline for Filing Objections to Disclosure Statement and Replies Thereto, (III) Approving Form of Notice Thereof, (IV) Establishing Document Depository Procedures in Connection Therewith, and (V) Granting Related Relief* [Case No. 17-3283; Docket No. 16398];
- (d) *Government Parties' Motion for Order Allowing Administrative Expense Claim for Amounts to Be Paid to LUMA Energy by PREPA During Interim Period*

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<sup>3</sup> In accordance with the Scheduling Order, the time allotments for the various speakers on the matters set forth in (c), (d), (e), (f), and (g) below will be provided in separate joint informative motions.

*Under Supplemental Agreement and the T&D Contract [Case No. 17-3283;*

*Docket No. 16241; Case No. 17-4780, Docket No. 2417];*

*(i) Renewed Limited Objection of Official Committee of Unsecured Creditors to Government Parties Motion for Order Allowing Administrative Expense Claim for Amounts to Be Paid to LUMA Energy by PREPA During Interim Period Under Supplemental Agreement and T&D Contract [Case No. 17-3283, Docket No. 16381; Case No. 17-4780, Docket No. 2439];*

*(e) Motion for Stay Relief Granting Leave to Prosecute Further Motions for Partial Summary Judgment [Case No. 17-3283; Docket No. 16326; Adv. Proc. No. 20-00003, Docket No. 142; Adv. Proc. No. 20-00004, Docket No.133 ; and Adv. Proc. No. 20-00005, Docket No. 154];*

*(i) Official Committee of Unsecured Creditors' (I) Response to Motion of Commonwealth of Puerto Rico, By and Through Financial Oversight and Management Board, for Stay Relief Granting Leave to Prosecute Further Motions for Partial Summary Judgment, and (II) Urgent Cross-Motion for Stay Relief for Leave to File Limited Objection, or in Alternative, to Intervene [Case No. 17-3283, Docket No. 16403; Adv. Proc. No. 20-00003, Docket No. 147; Adv. Proc. No. 20-00004, Docket No.138 ; and Adv. Proc. No. 20-00005, Docket No. 159];*

*(f) Official Committee of Unsecured Creditors' (I) Response to Motion of Commonwealth of Puerto Rico, By and Through Financial Oversight and Management Board, for Stay Relief Granting Leave to Prosecute Further Motions for Partial Summary Judgment, and (II) Urgent Cross-Motion for Stay Relief for*

*Leave to File Limited Objection, or in Alternative, to Intervene* [Case No. 17-3283, Docket No. 16403; Adv. Proc. No. 20-00003, Docket No. 147; Adv. Proc. No. 20-00004, Docket No. 138 ; and Adv. Proc. No. 20-00005, Docket No. 159];

(i) *Urgent Motion Requesting Entry of Order Setting Briefing Schedule and Hearing on Official Committee of Unsecured Creditors' Urgent Cross-*

*Motion for Stay Relief for Leave to File Limited Objection, or in the Alternative, to Intervene* [Case No. 17-3283, Docket No. 16404; Adv.

Proc. No. 20-00003, Docket No. 148; Adv. Proc. No. 20-00004, Docket No. 139; and Adv. Proc. No. 20-00005, Docket No. 160];

(ii) *Reply in Support of Official Committee of Unsecured Creditors' Urgent Motion Requesting Entry of Order Setting Briefing Schedule and Hearing on Official Committee of Unsecured Creditors' Urgent Cross-Motion for Stay Relief for Leave to File Limited Objection, or in the Alternative, to Intervene* [Case No. 17-3283; Docket No. 16430; Adv. Proc. No. 20-

00003, Docket No. 153; Adv. Proc. No. 20-00004, Docket No. 144; and Adv. Proc. No. 20-00005, Docket No. 165];

(g) *Urgent Motion of Official Committee of Unsecured Creditors to Schedule Hearing on Renewed Motion of Official Committee of Unsecured Creditors Pursuant to Federal Rule of Bankruptcy Procedure 3013 for Entry of Order Reclassifying Class 48A and Class 55 Claims Under Oversight Boards Plan of Adjustment Dated March 8, 2021* [Case No. 17-3283; Docket No. 16397];

(i) *Reply in Support of Urgent Motion of Official Committee of Unsecured Creditors to Schedule Hearing on Renewed Motion of Official Committee*

*of Unsecured Creditors Pursuant to Federal Rule of Bankruptcy  
Procedure 3013 for Entry of Order Reclassifying Class 48A and Class 55  
Claims Under Oversight Boards Plan of Adjustment Dated March 8, 2021  
[Case No. 17-3283; Docket No. 16531];*

(h) Any objections, responses, statements, joinders, or replies to any of the foregoing;  
and

(i) Any statements made by any party in connection with the Title III cases or any  
adversary proceeding pending therein.

2. In addition, Mr. Juan J. Casillas Ayala of Casillas, Santiago & Torres LLC and  
one of his co-counsel will also be attending, on behalf of the Committee, the Hearing  
telephonically.

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WHEREFORE, the Committee respectfully requests that the Court take notice of the above.

Dated: April 22, 2021

/s/ Luc A. Despins

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- and -

/s/ Juan J. Casillas Ayala

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